

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a  
OCEAN POINT TERMINALS, PORT  
HAMILTON REFINING AND  
TRANSPORTATION, and WEST INDIES  
PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**MOTION FOR ENTRY OF DEFAULT**

**COMES NOW** Plaintiff, by and through undersigned counsel, and hereby requests that the Clerk of the Court, pursuant to Federal Rules of Civil Procedure 55(a), enter a Default against Defendant West Indies Petroleum, Ltd. for failure to defend or otherwise plead in this action. In support of the Request for Entry of Default, Plaintiff refers to the attached Affirmation.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: March 28, 2023

BY: /s/ Lee J. Rohn

Lee J. Rohn, Esq.  
VI Bar No. 52  
1108 King Street, Suite 3 (mailing)  
56 King Street, Third Floor (physical)  
Christiansted, St. Croix  
U.S. Virgin Islands 00820  
Telephone: (340) 778-8855  
[lee@rohnlaw.com](mailto:lee@rohnlaw.com)

Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012  
**Motion for Entry of Default**

**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on March 28, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

Andrew C. Simpson, Esq.  
Andrew C. Simpson, P.C.  
2191 Church Street, Suite 5  
Christiansted, VI 00820  
Email Address: [asimpson@coralbrief.com](mailto:asimpson@coralbrief.com)  
Attorney For: Port Hamilton Refining and Transportation

Donnie M King, Esq.  
Akerman LLP  
201 East Las Olas Boulevard, Suite 1800  
Fort Lauderdale, Florida 33301  
Email Address: [Donnie.king@akerman.com](mailto:Donnie.king@akerman.com)  
Attorney For: Ocean Point terminals f/k/a Limetree By Terminals

BY: /s/ Lee J. Rohm (kj)